GW Natural Resources Group
GULF + WESTERN INDUSTRIES
Chemicals Division - Titanium

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May 5, 1980

Mr. Mark Baumgardner
State of Ohio Environmental Protection Agency
Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

Dear Mr. Baumgardner:

The following changes in our wastewater survey study plan (NPDES permit - E 317*BD) were made in response to your recommendations and are submitted for approval:

I. Process Review

A. Other possible sources for pollution not directly used in our processes would include, kerosene, gasoline, lubrication oils, methanol and a cleaning fluid, Ferlon caustic, all of which are used in drum quantities by our maintenance department.

Of these substances only kerosene, gasoline and the lubricating oils are used regularly. If any of the substances should reach our wastewater, virtually all would pass through 002 Outfall and should register under the Total Organic Carbon test. An insecticide, Diazinon, applied by a licensed applicator, A-C Exterminators of Cleveland, is used, infrequently, for ant control within the administration building. The substance is not likely to be found outside the building. A herbicide, Kannex, also applied by a licensed applicator, Azo Company of Canton, is used for weed control two or three times during summer months. If any should reach the Outfalls it should register under the Chlorinated Hydrocarbons or Total Organic Carbon tests. No known toxic substances should reach our waste water via air emissions. Building washown, essentially, is all titanium dioxide.

I. Process Review - cont.

B. As of yet, definite tests have not been determined regarding the microbiocides, Amerstat 295 and Nuosept 95, however, a testing procedure will be decided upon per agreement with Ohio EPA.

C. The information requested by Ohio EPA concerning cooling water system additives was sent to Joseph M. Reidy at the Division of Industrial Wastewater on May 5, 1980. A copy was sent to you, also.

II. Sampling and Analytical Methods

A. Outfall 001 and 002, and the Oxide Plant sump (Oxide Plant process wastewater) will be sampled in mid-Summer, late-Summer, Fall and Winter for a total of 12 samples.

B. A copy of the test methods to be employed by Envirolab was sent to you on April 2, 1980.

C. Glass containers with teflon cap seals will be used for all samples. One large (3L) sample will be composited automatically. At the end of the 24 hour sampling period the composite will be divided into smaller portions for testing. Samples will be iced for preservation during the automatic sampling period and the appropriate preservatives added where needed when the samples are collected. Medical grade, silicone rubber tubing will be used as an alternate to teflon since the ISCO samplers will not work with teflon tubing. Instrument Specialties Company has stated that medical grade, silicone rubber is comparable to teflon regarding any residuals which may effect analysis. The possibility of cross-contamination between Outfalls which could arise from interchanging tubing, will be averted by restricting the use of a given sampler along with its tubing to a specific Outfall. Then at the end of the study, a duplicate sample will be taken at 001 Outfall with the sampler which was used at 002 Outfall. A "blank" sample and a duplicate sample will be analyzed for each Outfall.

II. Sampling and Analytical Methods - cont.

D. pH, dissolved oxygen, conductivity and temperature measurements will be taken on site when the samples are collected. Notes regarding weather conditions, water usage, etc. at sampling time will be recorded.

Very truly yours,

D A Towner

For R. D. Delaney
Process Engineer

RDD/kr

cc: G+W - D. A. Towner
R. A. Schlosser
R. L. Suttman
A. C. Steinbronn